

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JDM IMPORT CO. INC., MG WORLDWIDE LLC, and  
ASIA PACIFIC JEWELRY, L.L.C.,

Plaintiffs,

v.

Case No. 1:20-cv- 08759-VEC

SHREE RAMKRISHNA EXPORTS PVT., LTD.,  
AMIT SHAH, and THE JEWELRY CO.,

Defendants.

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**NOTICE OF MOTION**

Nature of Action: State-law business tort action.

Moving Parties: Defendants, Shree Ramkrishna Exports, PVT., LTD, Amit Shah and The Jewelry Co.

Directed To: Plaintiffs.

Date and Time: To be determined by the Court.

Place: Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 443, or as otherwise directed by the Court.

Supporting Papers: Declaration of Amit Shah, dated March 30, 2021; Declaration of Rahul Dholakia, dated March 30, 2021; Declaration of Joseph P. Goldberg, Esq., dated January 22, 2021, with exhibits (Dkt. 20-2 – 20-8); Memorandum of Law, dated March 31, 2021.

Answering Papers: If any, must be filed by April 21, 2021, pursuant to the Court's Scheduling Order dated February 22, 2021. Defendants are to file and serve a reply by May 5, 2021.

Relief Requested: An Order dismissing the Amended Complaint in its entirety, with prejudice, together with such other and further relief as the Court deems just and proper.

Grounds for Relief: FRCP 12(b)(2), 12(b)(6). Dismissal is required because the Complaint fails to state a claim upon which relief can be granted, and the Court lacks personal jurisdiction over the defendants.

Oral Argument: Requested.

Dated: March 31, 2021

**HODGSON RUSS LLP**

*Attorneys for Defendants Shree Ramkrishna  
Exports, PVT., LTD, Amit Shah, and  
The Jewelry Company*

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